

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SONTERRA CAPITAL MASTER FUND, LTD., on behalf of itself and all others similarly situated,

Plaintiff,

- against -

BARCLAYS BANK PLC, BARCLAYS CAPITAL INC., COÖPERATIEVE CENTRALE RAIFFEISEN-BOERENLEENBANK B.A., DEUTSCHE BANK AG, LLOYDS BANKING GROUP PLC, THE ROYAL BANK OF SCOTLAND PLC, UBS AG AND JOHN DOE NOS. 1-50,

Defendants.

FRONTPONT EUROPEAN FUND, L.P., and RICHARD DENNIS, on behalf of themselves and all others similarly situated,

Plaintiffs,

- against -

BARCLAYS BANK PLC, BARCLAYS CAPITAL INC., COÖPERATIEVE CENTRALE RAIFFEISEN-BOERENLEENBANK B.A., DEUTSCHE BANK AG, LLOYDS BANKING GROUP PLC, THE ROYAL BANK OF SCOTLAND PLC, UBS AG, AND JOHN DOE NOS. 1-50,

Defendants.

No. 15-cv-03538 (VSB)

ECF Case

**NOTICE OF MOTION TO DISMISS
CONSOLIDATED
AMENDED COMPLAINT**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Marc J. Gotridge, dated April 11, 2016, and the exhibits thereto; the accompanying Declaration of David R. Gelfand, dated April 11, 2016, and the exhibit thereto; the accompanying Declarations of Allison

Cambria, dated April 11, 2016; John Connors, dated November 2015; Patrick Gonsalves, dated November 12, 2015; Jennifer Lobato-Church, dated April 11, 2016; Kevin P. McKendry, dated April 5, 2016; Joseph P. Randazzo, dated April 8, 2016; and Andrew Sherman, dated April 8, 2016; the Memorandum of Law in Support of Defendants' Motion to Dismiss the Consolidated Amended Complaint for Lack of Subject Matter Jurisdiction and Failure to State a Claim, dated April 11, 2016; the Memorandum of Law in Support of Foreign Defendants' Motion to Dismiss for Lack of Personal Jurisdiction, dated April 11, 2016; and all prior pleadings and papers filed in this action, Defendants Barclays Bank plc, Barclays Capital Inc., Coöperatieve Rabobank U.A. (f/k/a Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A.), Deutsche Bank AG, Lloyds Banking Group plc, The Royal Bank of Scotland plc, and UBS AG (collectively, "Defendants"), by their respective undersigned attorneys, will move this Court, before the Honorable Vernon S. Broderick, United States District Judge, in Courtroom 518 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York, on a date and at a time to be determined by the Court, pursuant to Rules 12(b)(1), 12(b)(2), and 12(b)(6) of the Federal Rules of Civil Procedure, for an order dismissing, as against Defendants, all claims in Plaintiffs' Consolidated Amended Complaint, filed on February 25, 2016 (Dkt. No. 95), and for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, as set forth in this Court's Order dated February 19, 2016 (Dkt. No. 93), any papers in opposition to this motion shall be filed and served no later than May 26, 2016.

Dated: New York, New York
April 11, 2016

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